

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

Rodriguez et al. v. Islamic Republic of Iran, Case No. 18-cv-12347 (GBD)(SN).

**ATTORNEY DECLARATION IN SUPPORT OF MOTION FOR DEFAULT
JUDGMENT**

Austin Estelle, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *Rodriguez* Plaintiffs in the above-captioned litigation and I submit this declaration (“Estelle Declaration”) in support of the motion for default judgment on behalf of the individual claimants listed in Exhibit A, attached hereto, and for permission to allow any remaining *Rodriguez* Plaintiffs to move for the same relief in separate stages.
2. The source of my information and the basis for my belief in my statements is my personal involvement in this matter; my firm’s representation of the claimants listed in Exhibit A in connection with the September 11th litigation as well as their family members; communications directly from family members of the individuals killed in the attacks on September 11th and the claimants listed in Exhibit A; official records provided by claimants; and other court records relating to this multi-district litigation. Any matters about which I lack personal knowledge are asserted herein upon information and belief.

3. I have been retained individually by the claimants listed in Exhibit A to pursue recovery for their solatium losses arising out of the deaths of their loved ones on September 11th. My office has verified that none of the claimants listed in Exhibit A have recovered for their damages previously, nor do they have any other pending motion before this Court for compensation arising out of the September 11th attacks.

4. The parties listed in Exhibit A are immediate family members, whose relationships to the decedents are described in Exhibit A; this relationship has been personally verified by attorneys and paralegals in my office that have obtained written documentation and/or conducted interviews confirming the nature of the relationships.

5. The immediate family member relationships described in Exhibit A satisfy the framework established by this Court and sufficiently shows that those claimants are eligible for solatium damages.

6. To minimize the chance of any human error in submitting the instant motion, we have complied with all due diligence safeguards. My firm has instituted a quality control process, during which an additional attorney and a paralegal review all case files and corroborate that the relationship as stated in this Declaration and that the claimants all survived the deaths of their loved ones on September 11th, 2001.

7. Accordingly, I respectfully request that this Court grant the proposed order.

Respectfully,

/s/ Austin Estelle
Austin Estelle
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Exhibit A

Plaintiffs Name	State	National Country	Decedent	Relationship	Award
Neil Shatzoff	NY	USA	Kathryn Shatzoff	Spouse	\$12,500,000
Alessandra Benedetti	NY	USA	Paul Benedetti	Spouse	\$12,500,000
Luis Jimenez Sr.	NY	USA	Luis Jimenez Jr.	Parent	\$8,500,000
Jimmy Jimenez	NY	USA	Luis Jimenez Jr.	Sibling	\$4,250,000
Sara Lefkowitz	NY	USA	Stephen Lefkowitz	Spouse	\$12,500,000
Daniel Lefkowitz	NY	USA	Stephen Lefkowitz	Child	\$8,500,000